- Ms. Fisher expected me to work weekends but when ask about Ms. Kelly she simply stated that Ms. Kelly had a child and it was hard for her. It didn't matter that I had 3 children.
- When I was hired for Asst, Nurse Manager by Ms. Fisher she said the reason I got the position is because she wanted to let Mr. Watson know that she was running her units the way she wanted .Ms. Fisher said that Mr. Watson did not want me in the position and that he wanted Ms. Benavides in that position .

EXHIBIT

D-13

CA 4:08-cv- 01273

FROM Ms. PIPICIN 9-18-06

- Ms. Fisher gave me a letter of expectations and told me not to get upset I was doing my job but that Mr. Watson was trying to get Ms. Kelly's job and so she had to keep us equal so that no one could touch her .She said she knew I worked hard but she had to protect Ms. Kelly.
- Ms. Edwards was assigned to Cid on the Ferguson unit and was not doing her job
 .Ms. Fisher told me not to worry about it and leave Ms. Edwards alone .but she
 expected the other nurses to do there work or they would be yelled at and
 embarrassed in front of everyone.
- Ms. Edwards called in to the unit one night and the unit called me and told me that she would not be in. Ms. Kelly called to see if Ms. Edwards had called me and I said no she had left a message with the control picket but I had left my cell phone for her if she called back because my house phone was not working I also tried calling Ms. Edwards back without success. The next day I notified Ms. Fisher and Ms. Fisher yelled at me for not being available and said I was being incompetent. She said that Ms. Edwards and Ms. Kelly had both tried to get in touch with me and I did not respond. Ms. Kelly denied that I had called her right back. I even had a statement from the control picket that I had answered my phone as soon as they had notified me.
- On several occasions the Ferguson Unit would called and tell me that the on-call could not be reached or would not come to the unit (Ms. Kelly). On one instance we had an offender that had been beaten and Ms. Kelly refused to go see him. She had told them to lay him in for the morning. The unit called me upset and I ended up going to the unit to handle the situation. When I talked to Ms. Fisher about it she would say that I was closer to the unit it did not hurt for me to go in but, if I had done that I would have been yelled at and written up.
- Ms.Kelly was allowed to leave during the day to doctors appointments and for test before her surgery but I was not I was told that they had to be made after work or I would have to make arrangements to take off and if I did not give 24 hours notice it would be unscheduled and if someone on my unit called in I would have to reschedule my doctors appt.I was even made to bring a note from the doctors office. I wasn't allowed to leave the nurses by themselves for appts.but Ms. Kelly could.
- I was made to email Ms. Fisher everyday upon arrival to the clinic. Ms. Kelly would be scheduled to come in at 0530 and most days would not arrive to the unit till 0700 and later when I ask about it Ms. Fisher would say that she had a child she needed to get to school .It was okay for her to leave a nurse by herself until she arrived but I was not allowed.
- Ms. Edwards was chosen to oversee CID in April 2005 we still had to answer scr for CID and I had to read ppd's etc. She would lay-in CID appts and then not see them. I was not allowed to say anything to her .Ms. Fisher said she would take care of it.
- Ms. Kelly and I had to have all CBO tools completed by a certain date I did mine but Ms. Kelly did not and in the nurse managers meeting when Mr. Watson said something about the CBO tools Ms. Fisher stated that Ms. Kelly was almost completed but she never completed them.